

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

<b>(1) NANA OMARI and</b>	)	
<b>(2) BILLY OMARI,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>Case. No. CIV-16-0693-HE</b>
<b>vs.</b>	)	
	)	<b>Removed from:</b>
<b>(1) FARMERS INSURANCE</b>	)	<b>Oklahoma County District Court</b>
<b>COMPANY, INC., a foreign corp.</b>	)	<b>Case No. CJ-2016-2702</b>
	)	
<b>Defendant.</b>	)	

**FARMERS INSURANCE COMPANY, INC.'S NOTICE OF REMOVAL**

COMES NOW Defendant, Farmers Insurance Company, Inc. (“Farmers”), pursuant to 28 U.S.C. §§ 1441 and 1446, and files this notice of removal of the above-titled action from the District Court of Oklahoma County, Oklahoma, to the United States District Court for the Western District of Oklahoma.

**STATEMENT OF GROUNDS FOR REMOVAL**

1. Plaintiffs Nana Omari and Billy Omari are individuals who reside in the county of Oklahoma, state of Oklahoma, and are citizens of the state of Oklahoma.

2. Defendant Farmers is a corporation organized under the laws of the state of Kansas and having its principal place of business in the state of Kansas, and is therefore a citizen of the state of Kansas.

3. On May 27, 2016, Plaintiffs commenced this lawsuit by filing a Petition against Defendant Farmers in Oklahoma County District Court alleging that “the amount in controversy is in excess of \$75,000.000,” and “requested reasonable attorney fees and

costs and any and all other relief of any type or nature to which Plaintiffs may be entitled.”  
(Exhibit # 1, Petition, P. 4).

4. On June 3, 2016, Plaintiffs’ Petition was served upon Defendant Farmers through the Oklahoma Insurance Department. (Exhibit # 2, Summons).

5. This Court therefore has jurisdiction over this action because of the complete diversity of citizenship of the parties hereto, and the sufficiency of the amount in controversy, pursuant to 28 U.S.C. § 1332 (a)(1).

6. In accordance with 28 U.S.C. § 1446(a), and LCvR 81.2, copies of all documents filed or served upon Defendant Farmers in this case to date, along with a copy of the state district court Docket Sheet, are submitted with this Notice of Removal. (Exhibit # 1, Petition; Exhibit # 2, Summons; and Exhibit # 3, State Court Docket Sheet).

7. Pursuant to LCvR81.2(b), Defendant Farmers advises there are no pending motions in the District Court of Oklahoma County, State of Oklahoma.

8. Discovery was served with the Petition and in accordance LCvR 81.2(c) is rendered void.

9. This Notice of Removal is filed within thirty (30) days of service of the Petition upon Defendant Farmers, and is therefore timely pursuant to 28 U.S.C. § 1446(b)(1).

WHEREFORE, PREMISES CONSIDERED, Defendant Farmers Insurance Company, Inc. prays that this Notice of Removal be accepted by the Court, and that the lawsuit proceeds as an action properly removed to this Court’s jurisdiction.

Respectfully submitted,

s/ Kelsie M. Sullivan

Phil R. Richards, OBA No. 10457  
Kelsie M. Sullivan, OBA No. 20350  
RICHARDS & CONNOR, PLLP  
ParkCentre Building, 12<sup>th</sup> Floor  
525 South Main Street  
Tulsa, Oklahoma 74103  
Telephone: (918) 585-2394  
Facsimile: (918) 585-1449

**ATTORNEYS FOR DEFENDANT  
FARMERS NSURANCE COMPANY,  
INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the \_\_\_\_ day of June, 2016, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Additionally, pursuant to 28 U.S.C. § 1446(d), true and correct copies of the Notice of Removal were mailed, postage prepaid, to the following:

Scott L. Tully, Esq.  
TULLY LAW FIRM  
P.O. Box 2141  
Broken Arrow, Oklahoma 74170-2860

**ATTORNEY FOR PLAINTIFFS  
NANA & BILLY OMARI**

Rick Warren  
Oklahoma County Court Clerk  
Civil Division  
320 Robert S. Kerr, Room 409  
Oklahoma City, OK

s/ Kelsie M. Sullivan

Kelsie M. Sullivan